

REMARKS

Claims 1-9 stand rejected under 35 U.S.C. § 102 as being anticipated by Jih '548. Claims 1 and 8 are independent. This rejection is respectfully traversed for the following reasons.

Claim 1 recites in pertinent part, an “address translation unit outputting the substitutive address to said instruction storage unit instead of the instruction address” and claim 8 recites in pertinent part “providing said instruction storage unit with the substitutive address instead of the instruction address.” One exemplary embodiment of the “address translation unit” of the present invention is shown in Figure 4 of Applicant’s drawings, whereby, for example, a multiplexer 24 can allow switching the address sent to the instruction storage unit 30 between the instruction address from the counter 10 and the substitutive address from the substitutive address storage unit 22, depending on a comparison between the instruction address and a modifying address at comparator 23.

The Examiner relies on element 30 of Jih as allegedly corresponding to the claimed “address translation unit.” However, element 30 merely directs the counter to switch between the memories (i.e., ROM 10 or RAM 20) *from* which the instruction is read, rather than outputting a different address *to* the memory. This distinction is evidenced by the fact that the multiplexer 40 of Jih is located at the output of the ROM and RAM, rather than at the input thereof. In Jih, the instruction address sent to the respective memories is not changed. Instead, when a special *instruction* (i.e., not address) from RAM 20 is detected, element 30 modifies the program counter so as to switch the multiplexer 40 whereby instructions from RAM 20 are executed rather than from ROM 10. Accordingly, Jih does not disclose or suggest outputting a different address to the memory depending on a comparison of the instruction address and a modifying address.

As anticipation under 35 U.S.C. § 102 requires that each and every element of the claim be disclosed in a single prior art reference, *Akzo N.V. v. U.S. Int'l Trade Commission*, 808 F.2d 1471 (Fed. Cir. 1986), based on the forgoing, it is submitted that Jih does not anticipate claims 1 and 8, nor any claim dependent thereon.

Based on the foregoing, it is submitted that claims 1-9 are patentable over Jih. Accordingly, it is respectfully requested that the rejection of claims 1-9 under 35 U.S.C. § 102 be withdrawn.

CONCLUSION

Having fully and completely responded to the Office Action, Applicants submit that all of the claims are now in condition for allowance, an indication of which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

MCDERMOTT, WILL & EMERY



Ramyar M. Farid
Registration No. 46,692

600 13th Street, N.W.
Washington, DC 20005-3096
(202) 756-8000 RMF:MWE
Facsimile: (202) 756-8087
Date: December 10, 2003